

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**UNITED STATES OF AMERICA**

**vs.**

Case:2:17-cr-20662  
Judge: Lawson, David M.  
MJ: Stafford, Elizabeth A.  
Filed: 10-11-2017 At 12:39 PM  
INDI USA V WASHINGTON (BG)

**VIOLATIONS: 18 U.S.C. § 666(a)  
18 U.S.C. § 371**

**D-1 CELIA WASHINGTON,**

**Defendant.**

**INDICTMENT**

The Grand Jury charges:

**GENERAL ALLEGATIONS**

1. At all times relevant to this Indictment, defendant **CELIA WASHINGTON** was an agent of the City of Detroit, Michigan, in that she was employed as a legal advisor to the Chief of the Detroit Police Department with the title of Deputy Chief of Police. Part of the defendant's job responsibilities included overseeing the Detroit Police Department's licensing, regulation, and use of private towing companies.

2. At all times relevant to this Indictment, Detroit, Michigan, was a local government entity that received federal assistance in excess of \$10,000 during each of the calendar years 2016 and 2017.

3. All of the overt acts in this Indictment occurred in the Eastern District of Michigan.

4. At all times relevant to this Indictment, the total potential yearly revenue for towing companies receiving City of Detroit tows exceeded two million dollars.

5. At all times relevant to this Indictment, City of Detroit towing rules were in place prohibiting a towing owner from having more than one towing company in each police district or precinct towing rotation.

6. At all times relevant to this Indictment, **CELIA WASHINGTON** was aware that the owner of several towing companies (“the owner”) had controlling ownership interest in multiple towing companies that had been placed in a single police district or precinct towing rotation, in violation of the City of Detroit towing rules.

**COUNT ONE**

(18 U.S.C. §§ 371 & 666(a) – Bribery Conspiracy  
Concerning Programs Receiving Federal Funds)

**D-1 CELIA WASHINGTON**

**THE CONSPIRACY**

From in and about February 2016 until June 2017, in the Eastern District of Michigan, Southern Division, defendant **CELIA WASHINGTON** did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with the owner and others, to corruptly agree to accept and accept cash from the owner with the intent to influence and reward **CELIA WASHINGTON** in connection with a business, transaction, or series of transactions of the City of Detroit, Michigan involving \$5,000 or more, in violation of Title 18, United States Code, Section 666(a).

**MANNER AND MEANS BY WHICH THE CONSPIRACY WAS CARRIED OUT**

It was part of the conspiracy that **CELIA WASHINGTON** would meet with the owner in the City of Detroit and accept thousands of dollars in cash from the owner.

It was further part of the conspiracy that, in exchange for the cash, **CELIA WASHINGTON** would tell the owner she would use her official position as Deputy Chief of Police to assist the owner with towing permits and rotation placement in the City of Detroit.

It was further part of the conspiracy that **CELIA WASHINGTON** assisted the owner in violating the City of Detroit rules that prohibited the owner from having multiple towing companies on a single district or precinct towing rotation.

### **OVERT ACTS**

In furtherance of the unlawful conspiracy, and to effect its objectives, the co-conspirators committed the following overt acts, among others:

1. In or about February of 2016, **CELIA WASHINGTON** met with the owner and requested money.
2. In or about February of 2016, the owner gave **CELIA WASHINGTON** at least \$3,000 in cash.
3. On April 28, 2016, **CELIA WASHINGTON** had a telephone conversation with the owner in which **WASHINGTON** made sure the owner would be able to comply with a deadline that **WASHINGTON** would be setting for the application for towing permits in the City of Detroit.
4. On May 6, 2016, the owner had a telephone conversation with an associate and told the associate that **WASHINGTON** wanted an email sent to **WASHINGTON**'s personal email address that specified which towing rotations the owner wanted in the City of Detroit.
5. On May 6, 2016, the owner had a telephone conversation with a relative

who works for the owner. The owner instructed the relative to send **WASHINGTON** the desired police precinct rotations that the relative wanted for the owner's towing businesses.

6. On May 9, 2016, the relative of the owner sent an email to **WASHINGTON**'s personal email address that described the desired police precinct towing rotations for the owner's towing companies.

7. On or about June 2, 2016, **CELIA WASHINGTON** assisted in issuing a towing rotation which violated the City of Detroit towing rules because the owner had multiple towing companies in single precincts.

8. On June 3, 2016, **CELIA WASHINGTON** had a telephone conversation with the owner and told the owner that she "did everything [she] could" to help the owner get his towing businesses placed in the police precinct rotations that the owner wanted.

All in violation of Title 18, United States Code, Sections 371 and 666(a).

**COUNT TWO**

(18 U.S.C. § 666(a) – Bribery Concerning Programs Receiving Federal Funds)

**D-1 CELIA WASHINGTON**

In or about February 2016, in the Eastern District of Michigan, Southern Division, defendant **CELIA WASHINGTON** did unlawfully and corruptly accept and agree to accept approximately \$3,000 in cash from the owner, with the intent to be influenced and rewarded in connection with a business, transaction, or series of transactions of the City of Detroit, Michigan involving \$5,000 or more.

All in violation of Title 18, United States Code, Section 666(a).

THIS IS A TRUE BILL

s/Grand Jury Foreperson  
GRAND JURY FOREPERSON

DANIEL L. LEMISCH  
Acting United States Attorney

s/R. Michael Bullotta  
R. MICHAEL BULLOTTA  
Assistant United States Attorney

s/David A. Gardey  
DAVID A. GARDEY  
Assistant United States Attorney  
Chief, Public Corruption Unit

Dated: October 11, 2017

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| <b>United States District Court<br/>Eastern District of Michigan</b> | <b>Criminal Case Cover Sheet</b> | <b>Case Number</b> |
|----------------------------------------------------------------------|----------------------------------|--------------------|

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**NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.**

|                                                                          |  |                                                                                                      |
|--------------------------------------------------------------------------|--|------------------------------------------------------------------------------------------------------|
| <b>Companion Case Information</b>                                        |  | Companion Case Number: 16-20732                                                                      |
| This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> : |  | Judge Assigned: Robert H. Cleland                                                                    |
| <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No      |  | AUSA's Initials:  |

**Case Title:** USA v. D-1 CELIA WASHINGTON

**County where offense occurred :** Wayne

Check One:  Felony  Misdemeanor  Petty

Indictment/  Information --- **no** prior complaint.  
 Indictment/  Information --- based upon prior complaint [Case number: ]  
 Indictment/  Information --- based upon LCrR 57.10 (d) [*Complete Superseding section below*].

## **Superseding Case Information**

Superseding to Case No: \_\_\_\_\_ Judge: \_\_\_\_\_

- Corrects errors; no additional charges or defendants.
- Involves, for plea purposes, different charges or adds counts.
- Embraces same subject matter but adds the additional defendants or charges below:

Defendant name Charges Prior Complaint (if applicable)

**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

October 11, 2017

Date \_\_\_\_\_

R. MICHAEL BULLOTTA  
Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.